



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MEB/HDM  
F. #2016R01176

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 18, 2020

**By Email**

Roland G. Riopelle, Esq.  
Sercarz & Riopelle, LLP  
950 Third Avenue, 32nd Floor  
New York, NY 10022

Re: United States v. Jeffrey Auerbach  
Criminal Docket No. 19 CR 607 (PKC)

Dear Counsel:

Enclosed please find the government's supplemental production of 18 U.S.C. § 3500 material ("3500 material"), and an updated list of the 3500 material, in advance of the defendant Jeffrey Auerbach's Fatico hearing, which the Court has scheduled for December 18, 2020 (the "Hearing"). The government also encloses a list of the Government Exhibits that the government intends to introduce during the Hearing.

Very truly yours,

SETH D. DUCHARME  
Acting United States Attorney  
Eastern District of New York

By:                     /s/                      
Mark E. Bini  
Hiral D. Mehta  
Assistant U.S. Attorneys  
(718) 254-8761/6418

Enclosures

United States v. Jeffrey Auerbach (19 CR 607) - §3500 Material Index			
Exhibit	Witness	Date	Type of Document
3500-JA-01	Auerbach, Jeffrey	10/4/2019	302
3500-RSJ-01	St Julien, Richard	11/23/2015	Cooperation Agreement
3500-RSJ-02	St Julien, Richard	11/23/2015	Transcript of Pleading
3500-RSJ-03	St Julien, Richard	11/23/2015	Information
3500-RSJ-04	St Julien, Richard	7/13/2015	302
3500-RSJ-04-A	St Julien, Richard	7/13/2015	Agent Notes
3500-RSJ-05	St Julien, Richard	8/13/2015	302
3500-RSJ-05-A	St Julien, Richard	8/13/2015	Agent Notes
3500-RSJ-05-B	St Julien, Richard	8/13/2015	Attachment 01
3500-RSJ-07	St Julien, Richard	9/2/2015	302
3500-RSJ-07-A	St Julien, Richard	9/2/2015	Agent Notes
3500-RSJ-08	St Julien, Richard	9/10/2015	302
3500-RSJ-08-A	St Julien, Richard	9/10/2015	Agent Notes
3500-RSJ-08-B	St Julien, Richard	9/10/2015	Attachment 01
3500-RSJ-09	St Julien, Richard	9/22/2015	302
3500-RSJ-09-A	St Julien, Richard	9/22/2015	Agent Notes
3500-RSJ-10	St Julien, Richard	10/20/2015	302
3500-RSJ-10-A	St Julien, Richard	10/20/2015	Agent Notes
3500-RSJ-10-B	St Julien, Richard	10/20/2015	Attachment 01
3500-RSJ-11	St Julien, Richard	12/14/2015	302
3500-RSJ-11-A	St Julien, Richard	12/14/2015	Agent Notes
3500-RSJ-12	St Julien, Richard	12/17/2015	302
3500-RSJ-12-A	St Julien, Richard	12/17/2015	Agent Notes
3500-RSJ-12-B	St Julien, Richard	12/17/2015	Attachment 01
3500-RSJ-13	St Julien, Richard	2/2/2016	302
3500-RSJ-13-A	St Julien, Richard	2/2/2016	Attorney Notes
3500-RSJ-13-B	St Julien, Richard	2/2/2016	Agent Notes
3500-RSJ-14	St Julien, Richard	3/21/2016	302
3500-RSJ-14-A	St Julien, Richard	3/21/2016	Agent Notes
3500-RSJ-15	St Julien, Richard	8/25/2016	302
3500-RSJ-15-A	St Julien, Richard	8/25/2016	Agent Notes
3500-RSJ-16	St Julien, Richard	11/1/2016	302
3500-RSJ-16-A	St Julien, Richard	11/1/2016	Agent Notes
3500-RSJ-17	St Julien, Richard	11/7/2016	302
3500-RSJ-17-A	St Julien, Richard	11/7/2016	Agent Notes
3500-RSJ-18	St Julien, Richard	11/29/2016	302
3500-RSJ-18-A	St Julien, Richard	11/29/2016	Agent Notes
3500-RSJ-19	St Julien, Richard	1/9/2017	302
3500-RSJ-19-A	St Julien, Richard	1/9/2017	Agent Notes
3500-RSJ-20	St Julien, Richard	1/30/2017	302
3500-RSJ-20-A	St Julien, Richard	1/30/2017	Agent Notes
3500-RSJ-21-A	St Julien, Richard	3/13/2017	Agent Notes
3500-RSJ-22-A	St Julien, Richard	3/30/2017	Agent Notes
3500-RSJ-23-A	St Julien, Richard	4/3/2017	Agent Notes
3500-RSJ-24-A	St Julien, Richard	4/12/2017	Agent Notes

Exhibit	Witness	Date	Type of Document
3500-RSJ-25	St Julien, Richard	7/13/2015	Proffer Agreement
3500-RSJ-26	St Julien, Richard	8/13/2015	Proffer Agreement
3500-RSJ-27	St Julien, Richard	9/10/2015	Proffer Agreement
3500-RSJ-28	St Julien, Richard	10/20/2015	Proffer Agreement
3500-RSJ-29	St Julien, Richard	11/3/2016	E-mail Correspondence
3500-RSJ-30	St Julien, Richard	-	Loose Notes
3500-RSJ-31	St Julien, Richard	4/20/2017	Trial Transcript
3500-RSJ-32	St Julien, Richard	4/24/2017	Trial Transcript
3500-RSJ-33	St Julien, Richard	4/25/2017	Trial Transcript
3500-RSJ-34	St Julien, Richard	4/26/2017	Trial Transcript
3500-RSJ-35	St Julien, Richard	3/6/2018	Trial Transcript
3500-RSJ-36	St Julien, Richard	8/20/2018	302
3500-RSJ-36-A	St Julien, Richard	8/20/2018	Agent Notes
3500-RSJ-36-B	St Julien, Richard	8/20/2018	Attachment 01
3500-RSJ-36-C	St Julien, Richard	8/20/2018	Attachment 02
3500-RSJ-36-D	St Julien, Richard	8/20/2018	Attachment 03
3500-RSJ-36-E	St Julien, Richard	8/20/2018	Attachment 04
3500-RSJ-36-F	St Julien, Richard	8/20/2018	Attachment 05
3500-RSJ-36-G	St Julien, Richard	8/20/2018	Attachment 06
3500-RSJ-36-H	St Julien, Richard	8/20/2018	Attachment 07
3500-RSJ-36-I	St Julien, Richard	8/20/2018	Attachment 08
3500-RSJ-36-J	St Julien, Richard	8/20/2018	Attachment 09
3500-RSJ-36-K	St Julien, Richard	8/20/2018	Attachment 10
3500-RSJ-36-L	St Julien, Richard	8/20/2018	Attachment 11
3500-RSJ-36-M	St Julien, Richard	8/20/2018	Attachment 12
3500-RSJ-36-N	St Julien, Richard	8/20/2018	Attachment 13
3500-RSJ-36-O	St Julien, Richard	8/20/2018	Attachment 14
3500-RSJ-36-P	St Julien, Richard	8/20/2018	Attachment 15
3500-RSJ-36-Q	St Julien, Richard	8/20/2018	Attachment 16
3500-RSJ-36-R	St Julien, Richard	8/20/2018	Attachment 17
3500-RSJ-37	St Julien, Richard	8/20/2018	Section 5K1.1 Letter
3500-RSJ-38	St Julien, Richard	10/15/2018	FD-1057
3500-RSJ-39	St Julien, Richard	12/17/2020	Agent Notes

United States v. Jeffrey Auerbach - 19 CR 607 (PKC) Government Exhibit List			
GX	Description	Date of Exhibit	Date Admitted
GX-01	E-Mail from "John StJames" on October 14, 2014: "Agreement"	10/14/2014	
GX-02	E-Mail from Jeff Auerbach on October 14, 2014: "Fwd: FNRG Contract"	10/14/2014	
GX-02-A	Agreement between ForceField Energy Inc. and Red Rock Marketing Media	10/14/2014	
GX-03	E-Mail from Jeff Auerbach on October 14, 2014: "WWH AGREEMENT"	10/14/2014	
GX-03-A	Consulting Agreement between World Wide Holdings, LLC and ForceField Energy Corp.	10/22/2014	
GX-04	February 28, 2015 Belize Bank Statement - Account x0280 (Adventure Overseas Holding, Corp.)	2/28/2015	
GX-05	Transfer Journal for issue ForceField Energy Inc. (February 28, 2015)	2/28/2015	
GX-06	Transfer Journal for issue ForceField Energy Inc. (March 5, 2015)	3/5/2015	
GX-07	E-Mail from Investment International on March 27, 2015: "transaction J Mc Cluskey"	3/27/2015	
GX-08	March 31, 2015 Wells Fargo Bank Statement - Account x8274 (Scott Olson)	3/31/2015	
GX-09	Instructions for \$20,000 wire transfer to TD Bank Account x8204 (Hilary L. Auerbach)	-	
GX-10	Extraction Report for Richard St Julien iPhone	8/20/2015	
GX-10-A	Excerpt from Richard St Julien cell phone extraction report	4/17/2015	